

ELEVENTH: That the said Mary D. Schaffer and J. Arthur Schaffer paid the said purchase price and was delivered a deed for said real estate by Frank J. Campbell, Executor of the Estate of Andrew J. Kreitz, deceased, as aforesaid.

TWELFTH: That your Complainants, Joseph E. May and Clothilda May, his wife, made application to The Farmers State Bank, Emmitsburg, Maryland, for a loan and it became necessary to contact the Defendants, Edna Kreitz and Paul Kreitz, widow and son of Joseph A. Kreitz, now deceased, respectively, concerning the aforesaid substitution of purchasers, whereupon the said Edna Kreitz and Paul Kreitz have asserted a claim to said real estate; that the said Edna Kreitz and Paul Kreitz claim an interest in and to the said real estate for that the substitution of Mary D. Schaffer and J. Arthur Schaffer was made after the Sale of the said real estate to Joseph A. Kreitz had been ratified and confirmed by the Orphans' Court for Frederick County.

THIRTEENTH: That such claim of Edna Kreitz and Paul Kreitz, asserted as aforesaid constitutes a cloud upon the title to the said real estate, and has prevented, and now prevents your Complainants from either selling the same for its full value or from adequately improving or using their said lot.

FOURTEENTH: That while said claim so asserted by the said Defendants has no valid foundation either in law or in equity, yet the same operates as a cloud upon your Complainants' title, and your Complainants are without an adequate remedy at law, and save for the intervention of this Honorable Court are without any remedy to protect their rights in the premises.

TO THE END, THEREFORE:

1. That the Defendants, Edna Kreitz and Paul Kreitz, may be perpetually enjoined against asserting such alleged right to any portion of said real estate described in these proceedings as the property of your Complainants; and that such cloud upon your Complainants' title to their said property may be removed.

2. And that your Complainants may have such other and further relief as their case may require.